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Attorney Docket No. 3926.188

Application No: 10/539,840

Amendment A

Reply to Office Action Dated 04/10/2007

### REMARKS

Claims 18 and 20-38 remain in the application. Claim 18, 24, 27-28, and 33 have been amended. Claims 1-17 and 19 have been cancelled.

#### **Drawings**

The drawings are objected to under 37 CFR 1.83(a) as not showing every feature of the invention specified in the claims.

More specifically, the Examiner has sated that the housing (claim 1), the hard wire or hard circuit (claim 22), the LED-modules (claim 30), the common carrier (claim 32), and the common supplemental optical element (claim 37) must be shown or the features(s) cancelled from the claim(s).

Applicant would like to point out that applicant shall only furnish drawings "where necessary for the understanding of the subject matter sought to be patented." See 35 U.S.C. 113. The features that are self-explanatory or can be easily understood by a person skilled in the art are not required to be shown in the drawings.

The features listed above are believed to be common features that can be readily understood by a person skilled in the art. The Examiner is, therefore, requested to withdraw the drawing objections.

### Claims Objections

Claim 19 is objected to because the limitation "the lens" in line 3 has insufficient antecedent basis. Claim 33 is objected to because of informalities.

(WP389812;3)

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Appropriate corrections have been made.

# Claim Rejections - 35 U.S.C. § 112

Claims 18, 31, and 35 are rejected under 35 USC 112, second paragraph, as being indefinite.

More specifically, the Examiner has sated that in claim 18 it is unclear how the multiple LEDs organized into an array create an array when there are nonfunctional or missing LEDs.

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Although the word "array" is believed to be clear, it has been changed to "group arrangement" to facilitate the prosecution.

The Examiner has also sated that in claims 31 and 35 it is unclear how and where the LED-modules are released.

The limitation "releasably connected with each other" basically means that the LED modules can be connected or disconnected with each other, namely the connection is releasable. It does not mean that the LED modules will be released.

The Examiner is, therefore, requested to withdraw the rejections under 35 U.S.C. § 112.

## Claim Rejections - 35 U.S.C. § 103

Claims 18-30, 32-34, and 36-38 are rejected under 35 U.S.C. 103(a) as being unpatentable over Begemann et al. (WO 2001/01037) in view of Chen et al. (US 6,520,669).

Claims 31 and 35 are rejected under 35 U.S.C. 103(a) as being unpatentable over (WP389812;1) - 7 -

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Begemann et al. and Chen et al. and further in view of Moriyama et al. (US 2004/0252501).

According to Begemann et al., the headlamp sends out several cones of rays, which have different spectral (color specific) characteristics. The different spectral characteristics should be adjusted to different sensitivity of the eyes (see page 3, lines 12-32). This aspect of differentiation of the applied LEDs is not the subject of the present invention. Rather, according to the present invention, the applied LEDs are basically not differentiated; at most the individual LEDs are not activated or can be activated or not provided at all for producing the asymmetric array airangement.

Also, the reference number 2 and 3 in Figs. 1a of Begemann et al. do not refer to optical elements, but rather headlamps (see page 5, line 19). Begemann et al. do not disclose any optical element that is part of a LED-module. In contrast, according to the present invention, the optical element is formed as a common collection lens for all the LED-chips, which are arranged in the focal plane of the common collection lens.

Further, it is doubtful that Begemann et al. show an asymmetric arrangement of LEDs. It appears that the LEDs according Fig. 2 are arranged and operated symmetrically. The distribution of radiation as shown in Figs. 3 and 4 can have different reasons. They do not have to be produced by an asymmetric design of LEDs.

The other cited references do not make up for the deficiencies of Begemann et al.

It is, therefore, believed that claim 18 is patentable over the cited prior art and since all the dependent claims are ultimately dependent on claim 18, they are believed to be patentable as well.

(WP385812;1)

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Favorable consideration and early issuance of the Notice of Allowance are respectfully requested. Should further issues remain prior to allowance, the Examiner is respectfully requested to contact the undersigned at the indicated telephone number.

Respectfully submitted,

Dated: May 1, 2007

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